

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:14-cr-20299
Judge: Edmunds, Nancy G.
MJ: Grand, David R.
Filed: 05-22-2014 At 04:19 PM
INDI USA V SEALED MATTER (EB)

VIOLATION: 18 U.S.C. §1344

D-1 ALI AYOUB

Defendant.

_____ /

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

D-1 ALI AYOUB

1. From about November 2008 through at least June 2009, in the Eastern District of Michigan, defendant ALI AYOUB knowingly and wilfully executed and attempted to execute a scheme and artifice to defraud financial institutions that were insured by the Federal Deposit Insurance Corporation. In furtherance of this scheme:
2. In and before November 2008 ALI AYOUB obtained credit cards in his own name and the names of others, in part by directing another person to provide ALI AYOUB with the other person's credit cards.

3. In December 2008 ALI AYOUB instructed another person to make non-sufficient funds payments toward the balances owed for credit cards which had been used to make purchases as requested by ALI AYOUB, which payments were material in that they induced the banks receiving them to extend additional credit
4. ALI AYOUB used the fraudulently obtained credit for his own benefit.
5. In May and June 2009 ALI AYOUB knowingly purported to make payments to banks with non-sufficient funds checks and online payments, knowing that he lacked funds in his bank accounts to back those payments, which fraudulent payments were material in that they induced the banks to which they were made, including Citibank, JPMorgan Chase Bank, US Bank, and Discover Bank, among others, to extend additional credit to ALI AYOUB.
6. In May and June 2009 ALI AYOUB used credit that he obtained by making purported payments toward the balances owed on credit cards to make purchases with those credit cards with no intent to repay the banks for the purchases so made, thereby further defrauding these banks. The banks so defrauded included Citibank, JPMorgan Chase Bank, US Bank, and Discover Bank, among others, each of which was a financial institution that was then insured by the Federal Deposit Insurance Corporation.

COUNT ONE
(18 U.S.C. §§ 1344 & 2 – Causing Bank Fraud)

1. The General Allegations are included in this count.
2. In early December 2008 defendant ALI AYOUB caused another to make payments in the amount of \$9800 and \$9750 to JP Morgan Chase Bank with checks that were drawn on accounts that did not have enough money in them to honor the checks, as ALI AYOUB well knew.
3. On about December 9, 2008, in the Eastern District of Michigan, defendant ALI AYOUB executed the scheme to defraud by causing another to use a JPMorgan Chase Bank credit card to make a purchase in the amount of about \$19,500, for which he had no intent to repay JPMorgan Chase Bank or to give funds to the other person with which to repay JPMorgan Chase Bank.
4. All in violation of Title 18, United States Code, sections 2 and 1344.

COUNT TWO
(18 U.S.C. § 1344 – Bank Fraud)

1. The General Allegations are included in this count.
2. On about May 26, 2009, defendant ALI AYOUB made and caused to be made a purported payment to Citibank in the amount of \$9950, well knowing that this purported payment was fraudulent.

3. On about May 27, 2009, ALI AYOUB made and caused to be made a purported payment to Citibank in the amount of \$9800, well knowing that this purported payment was fraudulent.
4. On about May 27, 2009, ALI AYOUB executed the scheme to defraud by using the restored credit on a Citibusiness Visa credit card to make a purchase in the amount of \$9964, for which he had no intent to repay Citibank.
5. All in violation of Title 18, United States Code, section 1344.

COUNT THREE
(18 U.S.C. § 1344 – Bank Fraud)

1. The General Allegations are included in this count.
2. On about May 27, 2009, defendant ALI AYOUB made and caused to be made a purported payment to US Bank in the amount of \$4750, well knowing that this purported payment was fraudulent.
3. On about May 28, 2009, ALI AYOUB made and caused to be made a purported payment to US Bank in the amount of \$5000, well knowing that this purported payment was fraudulent.
4. On about May 28, 2009, ALI AYOUB executed the scheme to defraud by using the restored credit on a US Bank credit card to make purchases in the amount of \$4650 and \$3710, for which he had no intent to repay US Bank.
5. All in violation of Title 18, United States Code, section 1344.

COUNT FOUR
(18 U.S.C. § 1344 – Bank Fraud)

1. The General Allegations are included in this count.
2. On about June 14, 2009, defendant ALI AYOUB made and caused to be made a purported payment to Discover Bank in the amount of \$7500, well knowing that this purported payment was fraudulent.
3. On about June 15, 2009, ALI AYOUB executed the scheme to defraud by using the restored credit on a Discover Bank credit card to make a purchase in the amount of \$9540, for which he had no intent to repay Discover Bank.
4. All in violation of Title 18, United States Code, section 1344.

COUNT FIVE
(18 U.S.C. § 1344 – Bank Fraud)

1. The General Allegations are included in this count.
2. On about June 14, 2009, defendant ALI AYOUB made and caused to be made a purported payment to Discover Bank in the amount of \$3000, well knowing that this purported payment was fraudulent.
3. On about June 15, 2009, ALI AYOUB executed the scheme to defraud by using the restored credit on a Discover Bank credit card to make a purchase in the amount of \$1950, for which he had no intent to repay Discover Bank.
4. All in violation of Title 18, United States Code, section 1344.

COUNT SIX
(18 U.S.C. § 1344 – Bank Fraud)

1. The General Allegations and paragraph two of Count Five are included in this count.
2. On about June 15, 2009, ALI AYOUB executed the scheme to defraud by using the restored credit on a Discover Bank credit card to make a purchase in the amount of about \$1100, for which purchase he had no intent to repay Discover Bank.
3. All in violation of Title 18, United States Code, section 1344.

THIS IS A TRUE BILL.

s/GRAND JURY FOREPERSON

BARBARA L. McQUADE
United States Attorney

s/JONATHAN TUKEL
Assistant United States Attorney
Chief, National Security Unit

s/LYNN A. HELLAND
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Dated: May 22, 2014

ORIGINALUnited States District Court
Eastern District of Michigan**Criminal Case Cover**

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MJ: Grand, David R.

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

Reassignment/Recusal Information

This matter was opened in the USAO prior to August 15, 2008 []

Companion Case InformationThis may be a companion case based upon LCrR 57.10 (b)(4)¹:

Companion Case Number:

Judge Assigned:

☐ Yes ☒ NoAUSA's Initials: Z a dCase Title: USA v. ALI AYOUBCounty where offense occurred : WayneCheck One: ☒ Felony ☐ Misdemeanor ☐ PettyX Indictment --- no prior complaint. Indictment/ Information - based upon prior complaint [Case number:] Indictment/ Information -- based upon LCrR 57.10 (d) [Complete Superseding section

below].

Superseding Case InformationSuperseding to Case No: Judge:

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 22, 2014

Date

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.